

## REMARKS

### Section 102 rejection of claim 1

Applicant amends the claim to recite publishing and subscribing from a *selected* communication channel. In support of this amendment, Applicant draws attention to paragraph 40 (page 17) of the application in which is described a channel architecture that defines communication channels to which business events are published. These channels are prioritized to ensure that events are sent to enterprise applications in the correct order.

*Gupta*<sup>1</sup> fails to teach the foregoing limitation of claim 1. As best understood, *Gupta* makes no distinction between different types of business events. All business events appear to be published to the same channel.

Claims 2-17 all include the limitations of claim 1 and are therefore allowable for at least the same reasons discussed above in connection with claim 1.

### Section 102 rejection of claims 18 and 38

In paragraph 16, the Office Action rejects claims 18 and 38 for the same reasons as claim 1. However, claims 18 and 38 recite limitations that are not present in claim 1. In particular, claims 18 and 38 both recite:

receiving a data object from a first application;

using a first controller to route the received data object to a first transformer;

and

receiving a request from a subscribing application to subscribe to the communication channel;

using a second controller to route the common format object to a second transformer;

As best understood, the Office considers the connectors **30** in *Gupta* to correspond to the claimed transformers. With this being the case, there appears to be no controller that routes a data object from an application **70** to a connector **30**. In fact, given that each connector **30** in FIG. 1 is tied to a particular application **70**, there is only one route from an application **70** to a

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<sup>1</sup> *Gupta*, et al., U.S. Patent No. 5,913,061.

connector 30. Hence, there is no need for any operation that could reasonably be called "routing."

Claims 19-27 and claims 39-48 include the limitations of either claim 18 or 38. These claims are therefore allowable for at least the same reasons discussed above in connection with claims 18 and 38.

### **Section 103 rejection of claim 28**

In paragraph 26, the Office Action rejects claim 28 for the same reasons as claim 1. However, the rejection of claim 1 is a section 102 rejection and the rejection of claim 28, which has limitations different from those of claim 1, is a section 103 rejection. It is therefore not possible for claims 1 and 38 to be rejected for the same reasons.

Applicant submits that the purported section 103 rejection fails to raise a prima facie case of obviousness because it fails to

- (1) identify what limitation of claim 28 is missing from the teaching of *Gupta*,
- (2) identify where that limitation is to be found, and
- (3) provide some motivation of why one of ordinary skill might combine the teaching of *Gupta* with the teaching of the unspecified source of the missing, and unspecified limitation.

Applicant is unable to respond in any meaningful way to a section 103 rejection that is so irredeemably flawed.

### **Summary**

Now pending in this application are claims 1-48, of which claims 1, 18, 28, and 38 are independent.

Applicant submits a fee for an extension of time. No additional fees are believed to be due in connection with the filing of this response. However, to the extent fees are due, or if a

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refund is forthcoming, please adjust our deposit account 06-1050, referencing attorney docket  
"12587-008001."

Respectfully submitted,

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